

COOLEY LLP  
MICHELLE C. DOOLIN (179445) (doolinmc@cooley.com)  
JENNIFER M. FRENCH (265422) (jfrench@cooley.com)  
4401 Eastgate Mall  
San Diego, CA 92121  
Telephone: (858) 550-6000  
Facsimile: (858) 550-6420

COOLEY LLP  
BEATRIZ MEJIA (190948) (mejiab@cooley.com)  
MATTHEW M. BROWN (264817) (brownmm@cooley.com)  
101 California Street, 5th Floor  
San Francisco, CA 94111-5800  
Telephone: (415) 693-2000  
Facsimile: (415) 693-2222

Attorneys for Defendant  
COLE HAAN

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

TAMMIE DAVIS, an individual, on behalf of  
herself and all others similarly situated,

Plaintiff,

v.

COLE HAAN, INC., a New York  
Corporation; and DOES 1 through 50,  
inclusive,

Defendants.

Case No. 11-cv-01826-JSW

**JOINT STIPULATION AND ~~PROPOSED~~  
ORDER RE PLAINTIFFS' CONSOLIDATED  
COMPLAINT**

Hon. Jeffrey S. White  
Courtroom

STEFANI CONCEPCION, an individual, on  
behalf of herself and all others similarly  
situated,

Plaintiff,

v.

COLE HAAN, INC., a New York  
Corporation; and DOES 1 through 50,  
inclusive,

Defendants.

Case No. 11-cv-02187-JSW

COORDINATED CASE No. 11-cv-02187-JSW

**JOINT STIPULATION AND ~~PROPOSED~~ ORDER RE PLAINTIFFS' CONSOLIDATED COMPLAINT**

1  
2 Plaintiffs Tammie Davis and Stefani Concepcion (“plaintiffs”) and defendant Cole  
3 Haan<sup>1</sup>, by and through their respective counsel, jointly submit the following Stipulation to allow  
4 plaintiffs to file a consolidated complaint on or before November 14, 2011.

5 **RECITALS**

6 **WHEREAS**, on June 29, 2011, Judge White issued an order coordinating the above-  
7 captioned related cases (*Concepcion v. Cole Haan Inc.*, Case No. 11-cv-02187-JSW, ECF No.  
8 19); and

9 **WHEREAS**, the parties agree that a consolidated complaint will promote the interests of  
10 judicial economy and efficiency;

11 **STIPULATION**

12 **NOW, THEREFORE, IT IS STIPULATED AND AGREED**, by the parties, through their  
13 respective counsel of record, that plaintiffs shall file a consolidated complaint on or before  
14 November 14, 2011.

15 **IT IS SO STIPULATED.**

16  
17 Dated: October 28, 2011

COOLEY LLP  
MICHELLE C. DOOLIN  
BEATRIZ MEJIA  
JENNIFER M. FRENCH  
MATTHEW M. BROWN

20  
21 /s/ Beatriz Mejia

Beatriz Mejia

22 Attorneys for Defendant  
23 COLE HAAN  
24  
25  
26  
27

28 <sup>1</sup> Cole Haan was erroneously sued as “Cole Haan, Inc.”

1 Dated: October 28, 2011

HARRISON PATTERSON & O'CONNOR LLP  
JAMES R. PATTERSON

2  
3 /s/ James R. Patterson  
James R. Patterson

4  
5 Attorneys for Plaintiff  
TAMMIE DAVIS

6 Dated: October 28, 2011

7 STONEBARGER LAW, APC  
8 GENE J. STONEBARGER  
RICHARD D. LAMBERT

9 /s/ Gene J. Stonebarger  
10 Gene J. Stonebarger

11 Attorneys for Plaintiff  
12 STEFANI CONCEPCION

13 **FILER'S ATTESTATION**

14 Pursuant to General Order No. 45, Section X, Subparagraph B, the undersigned attests that  
15 all parties have concurred in the filing of this Stipulation Regarding Deadline to Respond to  
16 Complaint.

17 Dated: October 28, 2011

COOLEY LLP  
MICHELLE C. DOOLIN  
BEATRIZ MEJIA  
JENNIFER M. FRENCH  
MATTHEW M. BROWN

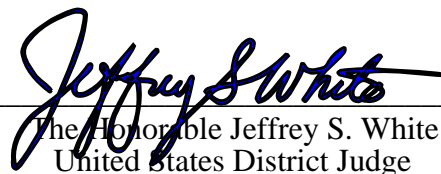
20 /s/ Matthew M. Brown  
21 Matthew M. Brown

22 Attorneys for Defendant  
COLE HAAN

23 The Court DENIES this stipulation without prejudice to refiling. In any amended stipulation, the  
24 parties shall address whether the cases should be consolidated for all purposes, or some purposes,  
and who shall be acting as lead counsel.

IT IS SO ORDERED.

25  
26 Dated: October 31, 2011

  
The Honorable Jeffrey S. White  
United States District Judge